

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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6-15-87  
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JUN 15 1987

HW-112

CERTIFIED MAIL -- RETURN RECEIPT REQUESTED

Mark Moothart, General Manager  
Pacific Wood Treating Corporation  
111 W. Division Street  
Ridgefield, Washington 98642

Re: Docket No. RCRA-1085-09-26-3009P



Dear Mr. Moothart:

The U.S. Environmental Protection Agency (EPA) has completed its review of the Ridgefield Brick and Tile (RBT) closure plan submitted pursuant to the requirements of the Consent Agreement and Final Order, signed into effect on November 21, 1985.

Paragraph 7 of the Final Order requires Pacific Wood Treating Corporation (PWT, owner and operator of RBT) to submit a closure plan and schedule addressing the following items:

- Installation of a ground water monitoring system which would comply with the requirements of 40 CFR Part 265, Subpart F;
- Compliance with the hydrogeologic information requirements of 40 CFR § 270.14(c);
- A quarterly analytical schedule for ground water samples which would address applicable parameters required by 40 CFR §§ 265.92 and 265.93 as well as pentachlorophenol and arsenic; and
- A soil sampling plan to determine if releases occurred from the former leachate collection system.

Of the four items delineated above and in the Final Order, only the soil sampling plan is adequate. To varying degrees, the remaining requirements to which the facility is subject are not sufficiently or appropriately addressed in the plan submitted to EPA by PWT. Examples of deficiencies are given below.

HWD:MB:mb:618/G:6/11/87		CONCURRENCES					
SYMBOL	<i>6/11/87</i>	<i>ELSEN</i>					
SURNAME	<i>BIO</i> RICE	ELSEN					
DATE	<i>6/11/87</i>	<i>6/11/87</i>					

The hydrogeologic characterization requirements of 40 CFR § 270.14(c) are virtually unaddressed by the plan. RBT is subject to these requirements independently of the Consent Agreement and Final Order, in that the facility's Part B permit application has been called. The requirements of 40 CFR Part 270 are applicable once a permit application has become due. As you know, your permit application was formally called in April 1985 and was due on October 11, 1985. This issue, while not specifically addressed in the Final Order, is still active, and a permit application is still required for the facility. Since the landfill received hazardous waste until January 25, 1983, EPA has no option but to require such a permit, covering, at the very least, post-closure care activities including ground water monitoring (see § 3005(i) of the Resource Conservation and Recovery Act, as amended). It was intended (and agreed) that this Consent Agreement and Final Order would provide the forum to begin development of the required hydrogeologic information. This requirement of the Order has not been met.

The proposed ground water monitoring program does not meet the requirements of 40 CFR Part 265 Subpart F. The intermittently saturated zone above the regional aquifer would not be investigated as to its nature and would not be monitored, according to the plan submitted. Instead, only the regional aquifer in the Troutdale formation would be monitored. The ground water monitoring program must be capable of determining the facility's impact on the quality of ground water in the uppermost aquifer, pursuant to 40 CFR § 265.90(a). The program proposed for RBT, which fails to address the uppermost saturated zone, would violate that requirement. In a hydrogeologic setting such as this, where the uppermost aquifer apparently is intermittently or seasonally saturated, the continuously saturated zone beneath the facility must also be addressed, since it would constitute the uppermost aquifer at least some of the time. Interconnection between the intermittently saturated zone and any zones of saturation beneath it must be identified and characterized. Failure to use test drilling and/or soil borings to characterize subsurface hydrogeology is a violation of 40 CFR §§ 265.90(a), 265.91(a)(1) and (a)(2), and 270.14(c)(2). Again, the terms of the Order are not met by the plan submitted.

Provisions to properly determine ground-water flow directions and rates have not been addressed in the submittal. Failure to so determine constitutes a violation of the sections cited in the preceding paragraph, as does a failure to assess the significance of vertical gradients when evaluating flow rates and directions.

Pursuant to 40 CFR § 265.91(a)(2), the number, locations, and depths of downgradient monitoring wells must ensure that they immediately detect any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer. This requirement is not limited to three downgradient wells and one upgradient well, as stated in the submitted closure plan, p. 18. Rather, this is the minimum acceptable number under 40 CFR Part 265 Subpart F. Failure to meet the performance standards required of a detection monitoring network is a violation of 40 CFR §§ 265.90(a) and 265.91(a)(2).

Pursuant to 40 CFR § 265.92(c)(1), quarterly values must be obtained from all wells for Appendix III (drinking water) parameters, ground water quality parameters, and parameters indicating contamination (delineated at 40 CFR § 265.93(b)). The Final Order requires RBT to include in its plan provisions for the quarterly monitoring of all applicable parameters listed at 40 CFR §§ 265.92 and 93, and pentachlorophenol and arsenic. The plan submitted calls for Appendix III analysis, minus radioactivity, coliform, and pesticides, to be accomplished only once. This is unacceptable. A complete Appendix III analysis must be conducted quarterly for one year. The frequencies proposed for the analyses of ground-water quality and ground-water contamination parameters are sufficient. The plan does not address the frequency of analysis for pentachlorophenol or arsenic. Such analyses should be conducted quarterly for at least the first year.

Given the discussions that have transpired between EPA and PWT representatives regarding the work that must be carried out at RBT and the requirements of the applicable regulations and the Order, PWT's submittal of such a deficient proposal is disconcerting. The document offers only a fraction of the plan required by the Consent Agreement and Final Order. The inadequacy of the submittal in fact constitutes a violation of Paragraph 7 of the Final Order. In addition, please note that the assessed penalty was suspended and deferred to October 30, 1987, at which time the penalty shall become due and payable unless the activities required in the order have been accomplished.

A revised closure plan which adequately addresses the items delineated in paragraph 7 of the Final Order is to be submitted to EPA within 30 days of your receipt of this letter. The schedule for its implementation must provide that all work will be completed within the terms of the Order and before October 30, 1987. Further technical comments regarding your submittal, which may prove helpful in developing a revision, were prepared by a consultant to EPA and are enclosed for your information and use. Assistance in developing an adequate plan to address the requirements of interim status detection monitoring and the hydrogeologic characterization requirements of 40 CFR § 270.14(c) can also be found in EPA guidance documents, particularly the RCRA Ground Water Monitoring Technical Enforcement Guidance Document (September 1986), a copy of which is enclosed for your reference.

The revision of your closure plan should be submitted in duplicate to my attention at the address above. Questions regarding the content of this letter should be addressed to Marcia Bailey at (206) 442-0684. Any legal matters should be referred to Henry Elsen at (206) 442-1191.

Sincerely,

/s/ KENNETH D. FEIGNER

Kenneth D. Feigner, Chief  
Waste Management Branch

Enclosures

bcc: G.Hofer w/o enc.  
J.Boller, WOO w/o enc  
Robert Farrell, w/o enc

JUN 15 1987

HW-112

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Mark Moothart, General Manager  
Pacific Wood Treating Corporation  
111 W. Division Street  
Ridgefield, Washington 98542

Re: Docket No. RCRA-1085-00-26-3002P

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SYMBOL	<i>MB</i> RICE	ELSEN			
SURNAME	RICE	ELSEN			
DATE	6/11/87	6/11/87			

EPA Form 1320-1 (12-70)

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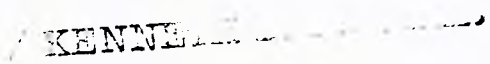
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Sincerely,

  
Kenneth D. Feigner, Chief  
Waste Management Branch

Enclosures

bcc: G.Hofer w/o enc  
J.Boller, WOO w/